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January 6, 2023

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Fraser v. City of New York, et al.*, No. 20-cv-04926 (CM)

Dear Judge McMahon:

We write on behalf of all parties further to the scheduled trial date in the above-captioned action. We understand that the current trial date remains January 24, but that the Court is looking into the feasibility of accommodating the scheduling conflicts raised in the parties' December 7 and 16 applications (ECF 92, 95). We understand that the difficulties in finding available trial dates on the Court's calendar are substantial and very much appreciate the Court's consideration of these issues. To the extent it is helpful, the parties have recently conferred and made arrangements in light of current schedules and are able to propose additional potential dates we and the witnesses can be available for trial beyond those listed in the parties' December 7 and 16 applications. The parties and witnesses are available for trial for any date within each of the following weeks, provided any such dates work for the Court:

- February 6, 2023
- March 14, 2023 (Plaintiff's counsel is unavailable the date of March 13)
- April 10, 2023
- April 17, 2023
- May 22, 2023
- May 29, 2023
- June 5, 2023
- June 12, 2023
- June 26, 2023

Should none of those dates be available, the parties are happy to consider additional dates, including dates later in 2023.

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Very truly yours,

/s/

Joel B. Rudin

JBR/tc

cc: Brian Francolla (by ECF)
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